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March 3, 2008

VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20005

Re: Fones4All Corporation, FCC Filer ID 825501, EB Docket No. 06-36

Dear Ms. Dortch:

Fones4All Corporation, through its undersigned counsel and in accordance with the Commission's *Public Notice* DA 08-171 in the above-referenced docket, respectfully submits its annual Customer Proprietary Network Information Certification and accompanying statement.

Please contact me if you have any questions regarding this filing.

Respectfully submitted,

WOMBLE CARLYLE SANDRIDGE & RICE
A Professional Limited Liability Company



Jennifer M. Kashatus

cc: Best Copy & Printing (via email)

Annual 47 C.F.R. § 64.2009 CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2007

Name of Company covered by this certification: Fones4All Corporation

Form 499 Filer ID: 825501

Name of Signatory:

Title of Signatory:

I, Scott A. Sarem, certify that I am an officer of Fones4All Corporation ("Fones4All") and acting as an agent of Fones4All, that I have personal knowledge that the company has operating procedures and policies in place that are designed to ensure compliance with the Federal Communication Commission's ("Commission") CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures are designed to maintain compliance with the Commission's CPNI rules.

Fones4All has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year. Fones4All does not have knowledge of any data breaches in 2007 that resulted in the unauthorized disclosure of CPNI.

Fones4All has taken measures to protect against attempts to gain unauthorized access to CPNI. Fones4All has not discovered any information about the processes that pretexters are using to attempt to gain access to CPNI other than the information that already is contained publicly in this docket. As mentioned in Attachment A, Fones4All has implemented CPNI safeguards, including, without limitation, maintaining customer verification processes and implementing network security procedures.

Fones4All did not receive any complaints in the past year concerning the unauthorized release of CPNI.

Signed

[INSERT NAME & TITLE]

March 1, 2008

Scott A. Sarem President / CEO

ATTACHMENT A

FONES4ALL

STATEMENT OF CPNI OPERATING PROCEDURES

Fones4All Corporation ("Fones4All") is a California corporation providing local and long distance service exclusively to Lifeline customers in the State of California, through the state's Universal Lifeline Telephone Service program.

Fones4All has established policies and procedures that are designed to ensure that it is in compliance with the Federal Communications Commission's ("Commission") rules regarding the use, disclosure, and access to CPNI. Fones4All provides this statement pursuant to Section 64.0009(e) of the Commission rules, 47 C.F.R. § 64.0009(e), to summarize those procedures and policies.

Permissible Use/Disclosure/Access to CPNI:

Fones4All may use, disclose and/or permit access to CPNI for the following purposes:

- (1) To provide the telecommunications service from which such information is derived;
- (2) For the provision of services necessary to, or used in, the provision of such telecommunications service, including the publishing of directories;
- (3) To initiate, render, bill and collect for telecommunications services;
- (4) To protect the rights or property of Fones4All, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
- (5) To provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if such call was initiated by the customer and the customer approves the user of such information to provide such services; and
- (6) As required by law, such as in response to a validly issued subpoena.

Employee Training/Disciplinary Process:

Fones4All trains its personnel as to what information is classified as CPNI when they are authorized and not authorized to use this information. Fones4All has an express disciplinary process in place for the misuse of CPNI, which includes the potential for termination.

Data Security Breaches/Requests for CPNI:

Fones4All has procedures in place to notify the United States Secret Service and the Federal Bureau of Investigation in the event of a data breach. Unless law enforcement directs otherwise, we will notify affected customers of the breach as soon as practicable after the expiration of the seven business day waiting period. We will maintain a record in accordance with section 64.2011(d) of any breaches discovered, notifications made to law enforcement, and notifications made to customers for at least two years.

Fones4All also has procedures in place for responding to requests for CPNI from any person other than the customer. It is Fones4All's policy not to release any information to any person other than the customer absent a validly issued subpoena.

Use of CPNI for Marketing Purposes:

Currently, Fones4All does not use CPNI for any marketing purposes. Therefore, Fones4All is not required to provide customer notice as set forth in the FCC's rules. If Fones4All subsequently decides to use CPNI for marketing purposes, then it will notify all affected customers, establish a supervisory review process for the use of CPNI for marketing purposes, and maintain appropriate records, as required by the Commission's rules.

Fones4All also does not share CPNI with any third party or affiliate for any marketing purposes.

CPNI Safeguards:

Fones4All has adopted authentication procedures for in-coming calls. It is Fones4All's policy not to release call detail information during an in-bound call. Instead, Fones4All employees may call the customer at the phone number of record or send that information to the address of record.

Fones4All customers do not have online account access. Fones4All does not operate a storefront.

Fones4All employees are required to be mindful of any attempts to compromise customer CPNI, including, but not limited to, any actions that pretexters may be taking to gain access to CPNI. Fones4All employees are required to notify their supervisor of any such attempts.

Fones4All also has implemented network security measures.

Notification of Account Changes:

Fones4All will notify customers immediately of certain account changes, including the change of a customer's address of record.

Customer Complaints:

Fones4All has procedures in place to track any complaints it receives concerning the unauthorized use, disclosure, or access to CPNI. If we receive complaints regarding CPNI, we will break them down by category, and provide a summary of the complaints in the annual certification that we provide to the Commission.